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January 3, 2025

By ECF

The Honorable Vincent L. Briccetti  
United States District Court Judge for the  
Southern District of New York  
300 Quarropas Street, Room 630  
White Plains, NY 10601

By 2/28/25, the parties shall  
submit ~~either~~ either a stipulation  
of dismissal or a further  
status report.  
So ordered:  
W. B. Webbert  
1/6/2025

Re: *Rodriguez et al. v. International Business Machines  
Corp.* (7:21-CV-09928)  
**Joint Status Report on Settlement**

Dear Judge Briccetti:

Counsel for the 16 individual Plaintiffs and for Defendant IBM  
submit this joint letter to update the Court regarding their progress on  
completing settlement.

On November 5, 2024, the Court ordered all deadlines stayed while  
the parties worked to complete their tentative settlement that would result  
in the dismissal of this case with prejudice and with no award of attorney's  
fees or costs. Since that Order, the parties have reached full agreement on  
all monetary and non-monetary terms and conditions and all 16 Plaintiffs  
have executed written settlement agreements.

Under the terms of the settlement, we expect Plaintiffs will file a  
stipulation of dismissal by about February 17, 2025. The Parties propose  
that the Court order them to submit a status report on Friday, February 28,

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2025, to advise the Court regarding the status of settlement, if the case has not already been voluntarily dismissed by that date.

If this proposed schedule meets with Your Honor's approval, a "So Ordered" line is provided below for the Court's convenience.

Respectfully submitted,

/s/ Matthew W. Lampe

Matthew W. Lampe  
Attorney for Defendant

/s/ David G. Webbert

David G. Webbert  
Attorney for Plaintiffs

cc: Matthew W. Lampe  
Kristina A. Yost  
Erika D. Cagney  
  
Attorneys for Defendant

IT IS SO ORDERED.

DATE: \_\_\_\_\_

\_\_\_\_\_  
Hon. Vincent L. Briccetti  
United States District Court Judge